

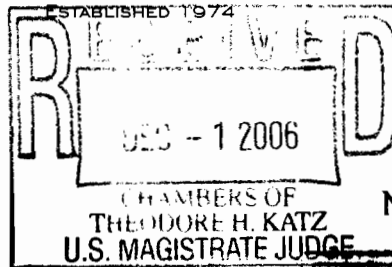
JAFFE & ASHER LLP
ATTORNEYS AT LAW

PLEASE REPLY TO NEW YORK OFFICE

600 THIRD AVENUE
NEW YORK, NY 10016-1901
(212) 687-3000
(212) 687-9639 (Fax)

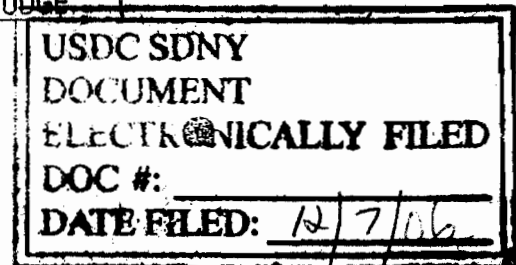
NEW JERSEY OFFICE

1107 GOFFLE ROAD
HAWTHORNE, NJ 07507-0508
(973) 423-3998
(973) 423-6074 (Fax)



November 29, 2006

Hon. Theodore H. Katz
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1660
New York, NY 10007-1312



Re: Wausau Underwriters Ins. Co. et al. v. QBE Ins. Corp., et al.
Civil Action No. 06 Civ. 3212 (VM) (THK)

Dear Magistrate Judge Katz:

Our law firm represents plaintiffs WAUSAU UNDERWRITERS INSURANCE COMPANY and AXIS SPECIALTY INSURANCE COMPANY in the above-entitled civil action.

On November 22, 2006, we sent a letter to Judge Marrero setting forth the nature and substance of a discovery dispute between plaintiffs and SCOTTSDALE INSURANCE COMPANY ("Scottsdale"). The letter also set forth our good faith efforts to resolve this discovery dispute with the attorneys for Scottsdale. A copy of the November 22 letter is enclosed herewith and incorporated herein. Judge Marrero endorsed the November 22 letter on November 28, 2006, referring the matters set forth therein to Your Honor for resolution.

For the reasons set forth in detail the November 22 letter, we respectfully request a conference to secure Scottsdale's compliance with plaintiffs' discovery demands and a for an extension of the November 27, 2006 deadline for fact discovery to sixty (60) days after Scottsdale complies with our long-outstanding discovery requests.

Hon. Theodore H. Katz
November 29, 2006
Page 2

Thank you for your courtesy and attention to this request.

Respectfully submitted,

JAFFE & ASHER LLP

BY: 

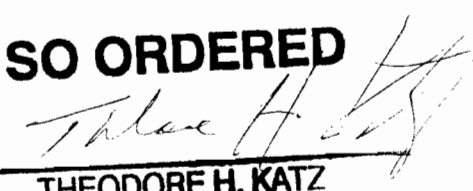
Michael J. Weiner, Esq. (MW 2397)

MJW:mjw
enc

cc: Leonard Porcelli, Esq. (w/ enc)
William H. Bave, Jr., Esq. (w/ enc)

*As determined at the pretrial
conference on this day, Defendant Scattolone
shall supplement its discovery responses by
December 14, 2006.
The discovery deadline is extended
to January 16, 2007.*

SO ORDERED


THEODORE H. KATZ
UNITED STATES MAGISTRATE